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IN THE UNITED STATES DISTRICT COURT  
FOR THE DIVISION OF MONTANA  
BUTTE DIVISION

GINA JAEGER, individually, AND AS  
PERSONAL REPRESENTATIVE OF THE  
ESTATE OF HER SISTER CHARLENE  
HILL,

Plaintiff,

vs.

GENESIS HEALTHCARE, INC.,  
d/b/a THE BUTTE CENTER,  
JOHN DOE LLC's 1-10;  
JOHN DOE, INC., 1-10

Defendants.

Cause No. CV-16-30-BU-SEH

**PLAINTIFF'S AMENDED  
MOTION TO  
REMAND CASE  
TO STATE COURT**

Plaintiff hereby respectfully moves this Court to remand this case back  
to the 2<sup>nd</sup> Judicial District Court of the State of Montana, Butte Silver Bow



County on the following grounds that Defendant, Genesis Healthcare, Inc. d/b/a Butte Center was properly served on May 12<sup>th</sup>, 2016 and the Notice of Removal filed by Peak Medical Montana Operations, LLC was filed more than 30 days after proper service on Defendant Genesis Healthcare, Inc. and therefore the Notice of Removal is untimely and the purported joinder by Genesis Healthcare, Inc. in Peak Medical Montana Operations, LLC's notice of removal is untimely.

DATED this 11<sup>th</sup> day of July, 2016.

/s/ Torger S. Oaas  
TORGER S. OAAS  
Attorney for Plaintiff